## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

## IN RE MUNICIPAL DERIVATIVES ANTITRUST LITIGATION

MDL No. 1950

Master Docket No. 08-2516(VM)(GMG)

ECF Case

STIPULATION AND PROPOSED ORDER EXTENDING TIME TO RESPOND TO COMPLAINTS

## THIS DOCUMENT RELATES TO:

State of West Virginia v. Bank of America, NA., No. 10-cv-769

Active Retirement Community, Inc. d/b/a Jefferson's Ferry v. Bank of America, N.A., et al., No. 1:10-cv-08273

Los Angeles Unified School District v. Bank of America, N.A. et al., No. 1:11-cv-00361

Kendal on Hudson, Inc. v. Bank of America, N.A., et al., No. 1:10-cv-09496

Peconic Landing at Southhold, Inc. v Bank of America, N.A., et al., No. 1:11-cv-00682

City of Los Angeles v. Bank of America, N.A., et al., No. 08-10351

City of Riverside, et al. v. Bank of America, N.A., et al., No. 09-10102

City of Stockton v. Bank of America, N.A., et al., No. 08-10350

Contra Costa County v. Bank of America, N.A., et al., No. 09-1197

County of San Diego v. Bank of America, N.A., et al., No. 09-1195

County of San Mateo v. Bank of America, N.A., et al., No. 09-1196

County of Tulare v. Bank of America, N.A., et al., No. 10-0628

Los Angeles World Airports v. Bank of America, N.A., et al., No. 10-0627

The Redevelopment Agency of the City of Stockton, et al. v. Bank of America, N.A., et al., No. 10-0630

Sacramento Municipal Utility District v. Bank of America, N.A., et al., No. 09-10103

Sacramento Suburban Water District v. Bank of America, N.A., et al., No. 10-0629

East Bay Municipal Utility District v. Bank of America, N.A., et al., No. 10-4990

City of Redwood City v. Bank of America, N.A., et al., No. 10-4988

City of Richmond v. Bank of America, N.A., et al., No. 10-4989

City of San Jose, et al. v. Bank of America,

N.A., et al., No. 10-04991 Redevelopment Agency of the City and County of San Francisco v. Bank of America, N.A., et al., No. 10-4987

WHEREAS, on April 4, 2011, the Court "so ordered" a stipulation extending Defendants' time to answer the complaints in the above-captioned matters (with the exception of the West Virginia matter) until "30 days following a ruling by the MDL 1950 Court on the motion to dismiss currently pending in *State of West Virginia v. Bank of America, N.A.* et al., No. 10-CV-769" (the "West Virginia Action");

WHEREAS, the Court denied Defendant Coöperatieve Centrale Raiffeisen-Boerenleenbank, B.A.'s ("Rabobank") motion to dismiss the West Virginia Action by decision and order filed on April 29, 2011;

WHEREAS, on May 13, 2011, the Court "so ordered" a stipulation between Plaintiff State of West Virginia and Rabobank, extending Rabobank's time to answer the complaint until on or before May 27, 2011;

WHEREAS, under the Court's April 4, 2011 Order, Rabobank's answer or response to the complaints by the plaintiffs in the other captioned matters (the "Public Entity Plaintiffs") is due on or before May 31, 2011;

WHEREAS, the parties have determined that an extension of Rabobank's time to answer the complaints is warranted to permit Rabobank additional time to prepare its answers and/or responses, as applicable, and that according Rabobank this additional time will not prejudice Plaintiffs or their ability to pursue discovery or their claims generally;

WHEREAS, one previous request for an extension of time to answer the West Virginia complaint has been made. There has been no previous request, following the Court's April 4, 2011 Order, to extend Rabobank's time to answer or otherwise respond to the Public Entity Plaintiffs' complaints;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among Plaintiff State of West Virginia, Public Entity Plaintiffs and Rabobank that Rabobank may file its answer or otherwise respond to the complaints on or before June

24, 2011.

By:

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So Ordered:

Gorenstein

United States Magistrate Judge

Dated: May 27, 20/1